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*Counsel for Plaintiffs Sierra Club,  
Center for Biological Diversity, and  
National Parks Conservation  
Association and Local Counsel for  
Plaintiff Northern Cheyenne Tribe*

*Counsel for Plaintiff Northern  
Cheyenne Tribe*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION

CROW INDIAN TRIBE, et al.,	)	
	)	Case No. CV 17-89-M-DLC
Plaintiffs,	)	
	)	(consolidated with Case Nos.
v.	)	CV 17-117-M-DLC,
	)	CV 17-118-M-DLC,
UNITED STATES OF AMERICA,	)	CV 17-119-M-DLC, and
et al.,	)	CV 17-123-M-DLC)
	)	
Federal Defendants,	)	<b>DECLARATION OF BETH</b>
	)	<b>BALDWIN IN SUPPORT OF</b>
and	)	<b>MOTION OF PLAINTIFFS</b>
	)	<b>NORTHERN CHEYENNE</b>
STATE OF WYOMING, et al.	)	<b>TRIBE, ET AL. FOR AN</b>
	)	<b>AWARD OF ATTORNEYS'</b>
Defendant-Intervenors.	)	<b>FEES AND COSTS</b>
	)	

I, Beth Baldwin, declare as follows:

1. I am counsel of record for the Northern Cheyenne Tribe in the above-captioned case and I have personal knowledge of the facts set forth below.

2. My firm, Ziontz Chestnut, has represented the Northern Cheyenne Tribe for over 40 years. We often represent the Tribe in its many dealings with the federal government, whether it be to compel the United States to fulfill its sacred trust responsibility, or to defend the Tribe from liability, or to negotiate contracts or similar instruments. Our firm's practice is devoted to representing Indian tribes in all matters, with a focus on environmental and natural resource matters.

3. Throughout our 40-plus years working for the Tribe, we have worked within the Tribe's limited budget by agreeing to charge low hourly rates. Although this is not how a typical private law firm does business, we gladly take this approach because we are deeply committed to the Tribe, with which we have a long and special relationship.

4. In this matter, Ziontz Chestnut served as lead counsel for the Tribe and had primary responsibility for advising the Tribe.

5. I am a partner with the firm. I graduated from the University of Colorado Law School in 2012 and was admitted to practice in Washington in 2013. I have extensive experience in environmental litigation and federal-court litigation with an emphasis on assisting tribes. For example, since 2014, I have represented

the Confederated Tribes of the Colville Reservation in the ongoing case, National Wildlife Federation v. National Marine Fisheries Administration, [case no. 3:01-cv-00640-SI], pending in the District of Oregon. That case involves complex ESA and NEPA claims. I also represented Colville in the following concluded ESA cases: Audubon Society v. U.S. Army Corps of Engineers [Case 3:15-cv-00665-SI, D. Oregon], and Wild Fish Conservancy v. Irving [Case 2:14-cv-00306-SMJ, W.D. Wash].

6. Joshua Osborne-Klein was with the firm from 2009 to 2018. He graduated from Seattle University Law School and was admitted to the Washington Bar in 2005. Before joining the firm, Joshua previously worked for three years as an associate attorney at Earthjustice, where he litigated a wide range of environmental matters, and served as a judicial clerk to Justice Susan Owens of the Washington Supreme Court following law school. During his nine years at Ziontz Chestnut, Josh advised and litigated on behalf of tribes to implement and enforce a wide range of federal environmental laws including the Endangered Species Act, Clean Water Act, Clean Air Act, as well as similar tribal laws.

7. Brian Chestnut is a partner and has over 25 years of experience representing tribes in natural resource matters. He graduated from Santa Clara University School of Law in 1993. He has implemented and litigated a wide range of federal and tribal environmental and natural resource laws on behalf of tribes.

8. Wyatt Golding is an associate and graduated from the University of Washington School of Law in 2011. Before he joined the firm in 2016, he gained extensive environmental litigation experience as an attorney for the Washington Forest Law Center.

9. Attached as an exhibit to this declaration is a true and correct copy of an itemized statement of the attorney time expended by counsel from the Ziontz Chestnut firm in this matter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of September, 2020, in Seattle, Washington.

/s/Beth Baldwin

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*Counsel for Plaintiff Northern  
Cheyenne Tribe*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was today served via the Court's CM/ECF system on all counsel of record.

/s/ Beth Baldwin  
Beth Baldwin